UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

Defendant.

KEITH TAYLOR

Affirmation in Support of Application for Order of Continuance

24 Mag. 2130

State of New York)

County of New York : ss.: Southern District of New York)

Rebecca R. Delfiner, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

- 1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A). This is the second order of continuance that has been sought in this case.
- 2. The defendant was charged in a complaint dated June 4th, 2024, with violations of 18 U.S.C. §§ 1343, 1028A, and 2, and 26 U.S.C. § 7201. The defendant was arrested on June 11, 2024, and was presented in this District before Magistrate Judge Sarah L. Cave on that same date, at which proceeding the defendant was represented by Brian Ketcham, Esq., and released on conditions.
- 3. At the presentment on June 11, 2024, a preliminary hearing was scheduled for July 11, 2024, after defense counsel consented to extend the deadline within which to conduct a

preliminary hearing. Under the Speedy Trial Act, the Government had until July 11, 2024, to file

an indictment or information. See 18 U.S.C. § 3161(b).

4. On July 9, 2024, Magistrate Judge Sarah Netburn entered an Order of Continuance,

pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a

preliminary hearing would have to be conducted or an indictment or information would have to be

filed in this case until August 12, 2024.

5. Defense counsel and I have had discussions regarding a possible disposition of this

The parties plan to continue our discussions, but do not anticipate a resolution before

August 12, 2024.

6. Therefore, the Government requests a continuance until September 11, 2024, to

continue the foregoing discussions toward resolving this matter. On August 5, 2024, I personally

corresponded with defense counsel, who specifically consented to this request. This application

has been authorized by Assistant United States Attorney Andrew Dember, Deputy Chief of the

Criminal Division.

7. For the reasons stated above, good cause supports the extension of the preliminary

hearing deadline, and the ends of justice served by the granting of the requested continuance

outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York

August 6, 2024

Rebecca R. Delfiner

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Assistant United States Attorney

212-637-2427

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